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Attorneys for Plaintiffs and Counter-Defendants (excluding Utherville International, Ltd.)

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA – RENO DIVISION**

UTHERVERSE, INC., a Nevada corporation,  
 BRIAN SHUSTER, an individual,

Plaintiffs,

v.

BRIAN QUINN, an individual; JOSHUA  
 DENNE, and individual; BLOCKCHAIN  
 FUNDING, INC. a Delaware corporation;  
 BLOCKCHAIN ALLIANCE LLC, a  
 Wyoming Limited Liability Company;  
 MASTERNODE PARTNERS, LLC, a  
 Wyoming Limited Liability Company;  
 LYNNE MARTIN, an individual; NIYA  
 HOLDINGS, LLC, a Nevada limited liability  
 company; NIMA MOMAYEZ, an individual;  
 and JEREMY ROMA, an individual,

Defendants.

AND RELATED COUNTERCLAIM.

Case No. 3:25-cv-00020-MMD-CSD

**NOTICE OF MOTION AND MOTION TO  
 DISMISS AMENDED COUNTERCLAIM**

**ORAL ARGUMENT REQUESTED**

**Complaint Filed:** January 10, 2025

**Counterclaim Filed:** February 28, 2025

**Amended Counterclaim Filed:** April 27, 2025

Date: TBD

Time: TBD

Courtroom: TBD

Filed Concurrently with Memorandum of  
 Points and Authorities and [Proposed] Order

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1 TO: Counterclaimants Brian Quinn (“Quinn”), Joshua Denne (“Denne”), Blockchain  
 2 Funding, Inc. (“Blockchain Funding”), Blockchain Alliance LLC (“Blockchain Alliance”),  
 3 Masternode Partners, LLC (“Masternode”), Niya Holdings, LLC (“Niya Holdings”), and Nima  
 4 Momayez (“Momayez”) (collectively, “Counterclaimants”) and their attorneys of record:

5 NOTICE IS GIVEN that Counter-Defendants, Uthervese, Inc. (“UI”), Brian Shuster  
 6 (“Shuster”), Uthervese Digital, Inc. (“UDI”), Peter Gantner (“Gantner”), Nexus Venture LLC  
 7 (“Nexus”), Ari Good (“Good”), and Gary Shuster (“Gary”), do and will, on a date and time most  
 8 convenient for this Court, or as soon thereafter as the matter may be heard, at the Bruce R.  
 9 Thompson Courthouse located at 400 S. Virginia St., Reno, NV 89501, move for an order  
 10 dismissing Counterclaimants Amended Counterclaim in this action, on the grounds that each claim  
 11 of the Amended Counterclaim fails to state a claim upon which relief can be granted pursuant to  
 12 Federal Rules of Civil Procedure, Rule 12(b)(6), and applicable law.

13 This motion is based upon this Notice and Motion, the Memorandum of Points and  
 14 Authorities in support thereof, and on the pleadings, records, and files in this action, and on such  
 15 further oral and documentary evidence as may be presented at the hearing of the motion.

16 Dated: May 30, 2025

COLEMAN & HOROWITT, LLP

17 By: /s/ Sherrie M. Flynn

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24 Attorneys for Plaintiffs Uthervese, Inc. and Brian  
 25 Shuster and Counter-Defendants Uthervese, Inc.,  
 26 Brian Shuster, Uthervese Digital Inc., Peter  
 27 Gantner, Nexus Venture LLC, Ari Good and Gary  
 28 Shuster